125

JOHN ASHCROFT
Governor

FREDERICK A. BRUNNER
Director

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks and
Historic Preservation

DIVISION OF ENVIRONMENTAL QUALITY
Kansas City Regional Office
4609 Norfleet
Independence, MO 64055
816-353-5001

LOW#
85-KC-022

CERTIFIED MAIL
No. 714952268

3.600 Jackson County
General Motors Leeds

July 8, 1985

RECEIVED
JUL 15 1985
WASTE
MANAGEMENT PROGRAM

Mr. L.N. Pemberton
Environmental Engineer
General Motors Corporation
Leeds Assembly Plant
6817 Stadium Drive
Kansas City, Missouri 64129

Dear Mr. Pemberton:

Enclosed please find a copy of the RCRA Compliance Inspection Report prepared for the Leeds Assembly Plant.

As stated in the report, this inspection revealed thirteen (13) violations of the rules and regulations pursuant to the Resource Conservation and Recovery Act and the Missouri Hazardous Waste Management Law. In response, the Department requests that General Motors Leeds Assembly Plant undertake appropriate remedial actions addressing those items listed. In addition, it is further requested that documentation be submitted which verifies compliance with noted recommendations. Said documentation is to include:

1) A copy of necessary amendments to the facility contingency plan which incorporate the following items:

   a) Updated facility drawings which indicate primary and secondary evacuation routes to be used in the event of an emergency in the hazardous waste management areas, in accordance with 40 CFR 265.52(f).

   b) A facility layout map showing locations of all emergency equipment and communications devices in waste management areas in conjunction with a listing of the physical descriptions and brief outline of the capabilities of each. 40 CFR 265.52(e).

c) A listing of specific actions to be taken by designated personnel in response to specific situations (i.e. spills, fire, ruptured drums, etc.) that can reasonably be anticipated. 40 CFR 265.52(a).

2) Certification that noted manifest deficiencies have been corrected in accordance with 10 CSR 25-5.010(4)(C) 3,6 and 9.

3) A copy of the amended closure plan which includes provisions for closure of the "Bonderite" listed wastewater treatment unit and decontamination of required equipment upon completion of closure activities in accordance with 40 CFR 265(112)(a) and (a)(3).

4) Certification that proper D.O.T. shipping names will hereafter be noted on container labels of waste paint. 10 CSR 25-5.010(6)(c).

5) A copy of the amended tank storage inspection schedule and log which includes provisions for daily observation and recording of fluid level within the structure as specified in 40 CFR 256.194 (a)(3).

6) A copy of amended inspection schedule(s) and log(s) which include emergency response equipment and communications devices in accordance with 40 CFR 265.15(b)(1).

7) A copy of amendments to the personnel training plan which address the job descriptions along with types and amounts of training required by the emergency coordinator, designated alternates and the program trainer in accordance with 40 CFR 265.16(d)(1)(2) and (3). Copies of respective training records shall be maintained for those individuals as required in 40 CFR 265.16(d)(4).

It is hereby requested that General Motors Leeds submit solicited documentation specifying corrective measures, on or before the 23rd of August, 1985. A copy of the documentation should be forwarded to this office and to Mr. Art Groner, Enforcement Section Chief, Missouri Department of Natural Resources, Waste Management Program, PO Box 176, Jefferson City, Missouri, 65102.

I believe the report is self-explanatory, but should questions or misconceptions arise, please contact Steve Johnson of my staff at (816) 353-5001.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY

James R McConathy

James R. McConathy
Regional Administrator

JRMc/SAJ/mab

cc: Ms. Sandra Carroll, WMP

Enclosure

3.600 Jackson County
Buick-Oldsmobile-Cadillac Group
Leeds Assembly Division

July 1, 1985

RCRA COMPLIANCE INSPECTION REPORT

FACILITY

General Motors Corporation
Buick-Oldsmobile-Cadillac Group
Leeds Assembly Plant
6817 Stadium Drive
Kansas City, Missouri 64129
(913) 281-7388

MO Generator ID#: 01486
EPA ID#: MOD000822668

PARTICIPANTS

Leeds Assembly Division:

Larry N. Pemberton
Environmental Engineer

Cindy L. Johnson
Environmental Engineer

Dennis McKinney
Administrator
Plant Engineering

Department of Natural Resources:

Steve Johnson
Environmental Specialist

INTRODUCTION

On June 11, 1985 a RCRA compliance inspection was conducted at the automobile manufacturing plant operated by the General Motors Corporation, Leeds Assembly in Kansas City, Missouri. The inspection was performed under authorization of Section 3007 of the Resource Conservation and Recovery Act of 1976 (RCRA) and the Missouri Hazardous Waste Management Law (1977), as amended.

The Leeds Assembly Plant is engaged in the assembly of automobile components (pre-manufactured) into a final product identified as the "J-Series" automobile. Primary activities include surface preparation and painting of automobile chassis and bodies, process line assembly and quality control operations. The plant currently employs approximately 4500 employees in production on a schedule of 2 shifts, 5 days per week. Occasional Saturday work schedules were noted. For additional details regarding the body preparation and painting process, the reader is requested to refer to previous inspection reports since the process description and mechanics are relatively unchanged since the last report of 6/84.

As a result of surface preparation and painting operations, the following waste streams are continually generated:

1) Spent solvent from cleaning of paint booths, equipment and purge of nozzles and lines when colors are changed. This D001 waste is generated at an approximate rate of 200,000 gallons per year (16,600 gallons per month). Spent solvents are delivered by dedicated line to a 14,500 gallon underground tank for temporary storage. Accumulated wastes are picked up and transported by Solvent Recovery Corporation once every 2-3 weeks for recovery at the Kansas City facility. Acetone (F003) is reportedly added during colder times of the year to reduce the viscosity of the naptha/toluene mixture normally utilized.

2) A caustic sludge (D002) is generated from solids settling in multiple caustic cleaner vats. The vats are used sporadically to degrease metal parts. Reportedly, individual vats are evacuated and cleaned once every 2-3 years with the resulting sludge being collected, drummed and transported to the USPCI treatment facility in Waynoka, Oklahoma. No sludge was reported to have been generated since the previous inspection.

3) General Motors generates a paint sludge from the water spray curtain used to scrub the exhaust stream from paint booths. Though the sludge has been determined to be non-hazardous, it is routinely transported to the USPCI facility in Oklahoma (OKD065438376).

4) A "Bonderite" sludge is generated from a new wastewater treatment unit installed on July of 1984. This treatment unit was designed to treat wastewater from the Bonderite ($ZnPO_4$) chemical conversion coating process on auto bodies. Despite the determination that the sludge is non-hazardous, this material is routinely collected in 21-yard gondolas and transported to the USPCI facility in Oklahoma. Estimated rate of generation is 1600-1800 gallons per month for disposal. Process water is discharged to the municipal sewer.

5) An ELPO sludge is generated from the excavation and clean-up of the electrophoric paint dipping (primer) operation. This material is characterized as a D008 waste with a generation rate of approximately 45-50 cubic yards (9,000-10,000 gallons) per month. Sludge is collected from a single high-volume sump tank serving the primer booth overspray and exhaust cleaner which is manually cleaned once every 2-3 weeks. The flocculated sludge (pH adjusted) is collected, containerized in closed gondolas (24 $yard^3$) and transported to the USPCI facility in Oklahoma for treatment/disposal.

6) An acid cleaning solution is generated from the flushing of facility heat exchange units. This D007 waste is generated intermittently at a rate of approximately 100 gallons per month. Wastes are collected in plastic drums for transport by, and to, USPCI in Oklahoma for treatment.

7) The assembly plant generates wastes categorized as sealants, adhesives, plastisols and rust inhibitors. They are characterized as D008 materials and are routinely transported to USPCI for disposal. Estimated generation rate is 18 drums (950 gallons) per year.

8) Off-specification waste paint is generated on occasion by the plant. This waste, characterized as D001, is drummed for transport by Solvent Recovery Corporation to its Kansas City facility for recovery and disposal. Estimated generation rate varies from 8-15 drums (400-750 gallons) per month.

9) Waste hydraulic and lubricating oils generated by the Leeds Assembly plant are drummed for storage in the hazardous waste storage pad. Transport and disposal of waste oils are currently under contract to Radium Petroleum of Kansas City. Exact generation rate is unknown but estimated at around 1500-2000 gallons per month.

Currently, Buick-Oldsmobile - Cadillac, Leeds Assembly Plant is still classified as a TSD facility pending review of submitted closure plans. Officials stated that no wastes are stored on-site for more than ninety (90) days and that they were seeking generator only status. No secondary treatment or resource recovery operations were noted.

UNSATISFACTORY FEATURES

1) The facility contingency plan fails to incorporate the following requirements:

   a) Updated primary and alternate evacuation routes to be used in the event of an emergency.
   b) A map denoting locations of all emergency equipment and communication devices in storage/operating areas.
   c) The facility spill response section and procedures has not been updated to include names and phone numbers of responsible (active) personnel. The SPCC plan submitted stated that maintenance personnel were responsible for spill control and clean up but makes no mention of specific procedures, equipment locations or other relevent information.

   d) The contingency plan fails to provide a complete list of all emergency equipment available including breathing apparatus, respirators, first aid units, and protective clothing. Capacities of items (where indicated) were not given.

2) Review of retained manifest documents revealed the following violations:

   a) Use of the name "Waste Solvent" is no longer allowable under DOT rules. Proper DOT shipping names must identify ignitable wastes as waste flammable liquid. In addition, several manifests to Solvent Recovery Corporation failed to denote the hazard class N.O.S. after the shipping name.

b) Manifest #01486-0368 failed to note a shipping date to be signed by the transporter.
c) Several manifests (including #01486-0357) failed to indicate presence of, or lack of, special handling instructions for wastes shipped.

3) The facility closure plan fails to address steps required for equipment decontamination.

4) The closure plan has not been amended to include the Bonderite sludge treatment/process water recovery unit.

5) Labels placed on D001 waste paint utilized an improper DOT shipping name ("paint") instead of flammable waste liquid.

6) Underground storage tank inspection schedule and logs do not include provisions for fluid level determination performed daily.

7) The facility inspection schedule failed to indicate provisions for inspecting emergency equipment in the waste storage areas and available communications devices (telephones).

8) The facility training plan does not indicate types and amounts of training required for the emergency coordinator (and alternates) or the actual trainer responsible for the program though each is included in the contingency plan. Job descriptions for those positions were also not listed.

COMMENTS

Several unsatisfactory items noted during this inspection were identified in the previous inspection of June, 1984. Though the facility's formal response stated compliance with noted deficiencies, submitted documents failed to corroborate full implementation. The inspector recommended that required plans be re-evaluated for content and completeness and that all materials, schedules, maps, etc. be kept in one organized file for each plan. Failure to properly document and implement required provisions will result in issuance of a violation notice and further enforcement action. In addition, it was stated that, should an emergency situation develop, the contingency plan must be complete and easily accessible for reference. Mr. Pemberton stated that necessary changes would be incorporated.

At the time of inspection, work was progressing on a new industrial wastewater treatment facility at the site. Officials cited the imposition of categorical pretreatment standards and facility need as reasons for its construction. Tentative plans call for completion of the project on, or near, September, 1985.

Construction of the Bonderite ($ZnPO_4$) wastewater treatment system was completed in August, 1984. In the system, Bonderite rinse water is discharged into a flow process utilizing an equalization basin, pH adjustment tank (NaOH), mixing chamber (polymer floc and emulsion breaking), secondary clarifier tank and twin sludge collection tanks. Sludge from collection tanks is pumped to a filter press for de-watering prior to placement in a storage gondola. Though the waste has passed EP toxicity analyses, it is handled as a listed F006 waste by definition. This waste, along with all other waste streams generated by the Leeds Plant, has been recently resampled and shipped for analysis. Officials are awaiting laboratory results.

Inspection logs maintained at the facility are, with noted exceptions, fairly comprehensive. The inspector commented that the underground solvent tank inspection schedule and logs maintained in the power house should be amended to include waste fluid levels recorded from daily "sticking" of the tank. In addition, this schedule and others utilized at the plant, must be updated to include inspection of all emergency spill, fire control and communication equipment in respective areas. Copies of the inspection schedules and logs shall be maintained with the facility contingency plan.

No spills or other emergencies involving hazardous waste management were noted during the past year.

The underground waste solvent storage tank was recently evaluated in December, 1984. Leak testing and structural analysis by Burns and McDonnell indicated no significant deficiencies with the tank. The tank is equipped with a manual control valve and has no external monitoring gauges.

Financial guarantee mechanisms were examined but not in great detail. No significant problems were in evidence.

The facility contingency plan denotes agreements and notifications of local police, fire and emergency response agencies as required,

however, should an event occur when more than one fire or police department may respond to an emergency, no primary authority provision is stated (40 CFR 265.37(a)(3)). It should be noted that since only Kansas City Missouri police and fire departments would conceivably respond, this requirement may be unnecessary. Nonetheless, if additional departments/agencies may respond, primacy should be designated with support roles assigned to secondary services. Upon completion of required plan amendments, copies of those plans must again be forwarded to appropriate agencies and emergency services as required.

RECOMMENDATIONS

1) The facility contingency plan must be amended to include the following provisions:

   a) Updated primary and alternate evacuation routes to be employed during an emergency (where appropriate) as specified in 40 CFR 265.52(f).
   b) An updated map showing locations of all emergency equipment and communications devices in waste management and storage areas.
   c) The plan must include specific actions that designated response personnel (including maintenance department employees) must take in response to specific situations that can be expected to arise in accordance with 40 CFR 265.52(a).
   d) The contingency plan must include a complete listing of all emergency equipment available for initial response, its location and capacity (where indicated) 40 CFR 265.52(e). This list must include breathing apparatus, respirators, first aid units, clothing and other relevant items maintained on-site.

2) Procedures for completion of required manifest must be amended to reflect the following items:

   a) Use of the proper DOT shipping name of waste solvent mixtures. The noted shipping name of "Waste Solvent" is no longer accepted by DOT rules. Instead, "Waste Flammable Liquid, NOS" is the proper DOT shipping name and hazard class as per 10 CSR 25-5.010(4)(c)6.

b) All dates certifying generation, transport and acceptance by an approved disposal facility must be identified on each manifest. 10 CSR 25-5.010(4)(C)3.
c) Special handling instructions, where indicated, as specified in 10 CSR 25-5.010(4)(C)9.

3) The facility closure plan shall be amended to indicate provisions for equipment decontamination as stated in 40 CFR 265.112(a)(3).

4) The facility closure plan must be amended to address closure of the Bonderite wastewater treatment unit including update of maximum inventory of wastes in storage. 40 CFR 265.112(a).

5) Identification labels placed on waste containers must utilize the proper DOT shipping name of the waste in accordance with 10 CSR 25-5.010(6)(c). Use of the term "paint" is not indicated as a proper DOT shipping name for waste paint (D001).

6) The facility inspection schedule and logs must be amended to include daily observations of the level of liquid waste in the underground storage tank as stated in 40 CFR 265.194(a)(3).

7) Facility inspection schedules and logs must be modified to include inspection of emergency response and communication devices maintained in waste storage areas as specified in 40 CFR 265.15 (b)(1).

8) The facility training plan must indicate job descriptions and types, and amounts, of training acquired by emergency coordinators and personnel responsible for said trainer in accordance with 40 CFR 265.16(d)(1)(2) and (3). Appropriate records of their training must be kept on file as specified in 40 CFR 265.16 (d)(4).

REPORT BY:

Steve A. Johnson
Environmental Specialist II

APPROVED BY:

Roma P. Jenkins
Environmental Engineer III

APPROVED BY:

James R. McConathy
Regional Administrator

SAJ/mab

HAZARDOUS WASTE TREATMENT/STORAGE/DISPOSAL FACILITY
Interim Status Checklist
10 CSR 25-7.011(1)(D)

Name of Facility: GM ASSEMBLY - LEEDS PLANT Date: JUNE 11 1985

Address: 6817 STADIUM DRIVE
KANSAS CITY, MO 64129 Missouri I.D. # 01486

Facility Representative: L.N. PEMBERTON EPA I.D. # MOD000822668

Title: ENVIRONMENTAL ENGINEER Phone Number (913) 281-7388

Is this facility a TSD? YES Transporter? NO, #

Provide a brief description of the manufacturing process.

PAINTING, ASSEMBLY AND QUALITY ASSESSMENT OF AUTOMOBILE COMPONENTS AND ASSEMBLED PRODUCTS (GM J-SERIES AUTOMOBILES) AUTOMATED PAINT BOOTHS (1 PRIME; 3 COLOR) SERVED BY DEDICATED WWT SYSTEMS FOR CLEANSING:

List the hazardous wastes produced:

Waste	Amount/month	Kilogram/month	I.D. #	Disposition
1. WASTE PAINT	400-750 gal		D001	RR/DISP-SRC-KC
2. SPENT SOLVENTS	16,600 gal		D001/F003	RR-SRC(KC)
3. CAUSTIC SLUDGE	—		D002	TREATMENT USPCI
4. BONDERITE SLUDGE (CHEM CONVERSION)	1600-1800 gal		F006	LF(USPCI) OK
5. ELPO SLUDGE	9,000-10,000 gal		D008	LF(USPCI) OK
6. OTHERS (REFER TO REPORT)				
Total				

Subtract amount going to Resource Recovery or sewer 17,000 GAL

Amount subject to generator fee @ 13000 GAL (@ 49000 kg) (Fee is applicable if this value is over 10 kkg annually. Fee based on generation from July 1 through June 30)

Is generator fee applicable to this facility? Yes ASSUMED PAID No ____ (If yes, is it being paid? Yes ____ No ____)

Is the head tax applicable to this facility? Yes ✓ No ____ (If yes, is it being paid? Yes ✓ No ____) (Quarterly ____ Annually ____)

Is the land disposal fee applicable to this facility? Yes ✓ No ____ (If yes, is it being paid? Yes UNKNOWN No ____)

If the total amount of hazardous waste generated is less than 100 kg/month, is over 100 kg ever accumulated? Yes ✓ No ____

If the total amount of hazardous waste generated is less than 1000 kg/month, is over 1000 kg ever accumulated? Yes ✓ No ____

If 1000 kg is never accumulated, is hazardous waste disposed of within 1 year? Yes N/A No ____

Has the generator determined if waste is hazardous? Yes ✓ No ____

A. MANIFESTS 10 CSR 25-5.010(4)

1. Generator's Missouri and EPA I.D. Numbers..... ✓
2. Serially increasing shipment number..... ✓
3. Mo. waste I.D. # correct..... ✓
4. Generator's name, address, phone number, EPA I.D. number.. ✓
5. All transporters' names, addresses, phone numbers, and EPA I.D. numbers..... ✓
6. Hazardous waste management facility name, address, phone number, and EPA I.D. number..... ✓
7. Proper DOT shipping name and hazard class..... ✓
8. Quantity, container type, and number of units being shipped..... ✓
9. Emergency instructions and special handling procedures.... ✓
10. Proper certification..... ✓
11. Manifest properly signed and dated..... ✓
12. Time between generator and facility signature no more than ✓
13. Manifests returned within 30 days..... ✓
14. If not, exception generator report submitted within 45 days..... ✓
15. Completed manifests submitted to Department quarterly..... ✓

B. CONTAINERIZATION AND LABELING 10 CSR 25-5.010(6)

16. Waste stored in proper DOT containers..... ✓
17. Containers labeled "Hazardous Waste" and labeled per proper DOT requirements during storage..... ✓ "PAINT" NOT PROPER DOT NAME

C. STORAGE STANDARDS 10 CSR 25-7.050

18. Facility inspected and maintained..... ✓
19. Ignitable and reactive wastes properly handled..... ✓
20. Date of accumulation marked..... N/A
21. Storage less than 90 days (if applicable)..... ✓ DO NOT SEE OVER 90 DAYS
22. Waste oil properly handled..... ✓

HAZARDOUS WASTE TREATMENT/STORAGE/DISPOSAL FACILITY
Interim Status Checklist
10 CSR 25-7.011(1)(D)

Off-site facility _____ Interim Status ✓

Provide a brief description of the hazardous waste TSD Processes.

List the hazardous wastes handled at each TSD process.

	Waste	Amount/month	I.D. #	TSD Process	Design Capacity
1.	STORAGE ONLY (LESS THAN 90 DAYS)				
2.					
3.					
4.					
5.					
6.					

UPDATE WHEN CHANGED

I. WASTE ANALYSIS 40 CFR 265.13

58. Waste analysis plan..... ☒
59. Identify hazardous wastes handled at facility..... ☒
60. Means to confirm wastes received from off-site..... NA

J. SECURITY 40 CFR 265.14

61. 24-hour surveillance system at facility..... ☒
62. An artificial or natural boundary..... ☒
63. A means to control entry..... ☒
64. Restricted access sign posted at each entrance..... ☒
65. Legible from a distance of 25 feet ..... ☐

K. GENERAL INSPECTION

66. Inspection log and written schedule for inspecting..... ☒ PRESENT BUT DISENTRANCED SECURITY
67. Inspect emergency equipment..... NA
68. Inspect security devices..... ☒
69. Inspect operating and structural equipment..... ☒

L. PERSONNEL TRAINING 40 CFR 265.16

70. Completed classroom or on-the-job training..... ☒
71. Job title, description, and name of person filling position..... ☒
72. Written record of the type and amount of training given..... NA NOT TO COORDINATE
73. Documentation confirming that training has been given... NA

M. PREPAREDNESS AND PREVENTION 40 CFR 265 Subpart C

74. Internal communication or alarm system..... ☒
75. Device in the hazardous waste operation area capable of summoning emergency assistance..... ☒
76. Fire control, spill control, and decontamination equipment available..... ☒
77. Adequate water supply for fire control equipment..... ☒
78. Adequate and proper safety equipment available..... ☒
79. Adequate aisle space..... ☐
80. Arrangements with local emergency agencies..... ☒

N. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 40 CFR 265 Subpart D

81. Contingency plan..... ☒
82. Detailed description of procedures that personnel must implement in response to fires, explosions, or release of hazardous waste..... NO
83. Describe formal arrangements with emergency agencies... ☒ LETTER SENT
84. Names, addresses, and phone numbers (home & office) of emergency coordinators..... ☒
85. Emergency equipment including its description and location..... NA
86. Evacuation plan if applicable..... ☒

Comment: ROUTES NOT IN CONTING PLAN BUT ARE POSTED AND ON FILE W PLANT SECURITY

O. MANIFEST, RECORDS, REPORTING 40 CFR 265 Subpart E

For off-site facilities

87. Manifests signed and dated..... NA
88. Copy to transporter..... ☒
89. Copy to generator in 30 days..... ☒ SOME EXCEPTIONS ON FILE
90. Copy at facility for 3 years..... ☒

Operating Record

91. Description, quantity, and TSD process for all hazardous wastes..... ☒ STORAGE
92. Location and quantity of all hazardous waste..... ☒
93. Waste analysis records from off-site sources..... NA
94. Summary and description of emergency incidents..... NONE
95. Record of inspections..... ☒
96. Monitoring, testing and analytical results if necessary ☒

Reporting

97. Annual report..... BIENNIAL/ANNUAL ☐
98. Unmanifested waste reports for off-site facilities..... NA
99. Reports for emergencies, spills, closure..... NONE

HAZARDOUS WASTE TREATMENT/STORAGE/DISPOSAL FACILITY
Interim Status Checklist
10 CSR 25-7.011(1)(D)

P. CLOSURE AND POST CLOSURE 40 CFR 265 Subpart G

100. Closure plan for facility..... ☒
101. Description of how and when facility will be closed.... ☒
102. Estimate of maximum inventory of hazardous waste..... ☒
103. Steps to decontaminate equipment..... ■
104. Post closure plan for disposal facilities only..... NA

Q. FINANCIAL REQUIREMENTS 40 CFR 265 Subpart H

105. Cost estimate for facility closure..... ☒
106. Financial assurance for closure and post closure..... ☒
107. Liability for sudden accidents..... ☒
108. Liability for non-sudden accidents for disposal only... ○ NOT OBTAINABE THROUGH INSURANCE CARRIER

R. INTERIM STATUS CONTAINERS 40 CFR 265 Subpart I

109. Containers in good condition..... ☒
110. Containers made of materials compatible with hazardous wastes placed into them..... ☒
111. Containers kept closed during storage..... ☒
112. Hazardous waste containers storage area inspected once a week..... ☒
113. Inspection log..... ☒
114. Containers holding ignitable or reactive waste at least 50 ft. from the property line..... ☒
115. Incompatible wastes placed in different containers..... NA
116. Are storage containers holding hazardous wastes which are incompatible with nearby materials separated by dikes, berms, walls, or other devices..... ☒

S. INTERIM STATUS TANKS CHECKLIST 40 CFR 265.192

117. Tanks in good condition..... ☒
118. Uncovered tanks have a minimum of 2 ft. of freeboard..... NA
119. If not, is the tank equipped with a containment structure, a drainage control system, or a diversion structure..... NA
120. Tanks with continuous inflow equipped with a means to stop inflow..... ☒

121. Are wastes analyses conducted before placing a substantially different waste into a tank used for storage or treatment..... ☒
122. Daily inspections conducted on discharge control equipment..... ☒ INFORMAL
123. Data gathered from monitoring equipment once each day.. NONE
124. Level of waste in tanks checked at least once each day. ■ CHECKED BUT NOT RECORD
125. Tanks inspected weekly..... ☒
126. Results of these inspections recorded..... ☒
127. If ignitable or reactive wastes in tanks, then is it treated, rendered, or mixed so that the mixture no longer meets the definition of ignitable or reactive... NA
128. Ignitable or reactive wastes stored properly..... ☒
129. Ignitable or reactive wastes in covered tanks in compliance with the National Fire Protection Agency's (NFPA's) buffer zone requirements..... ☒

T. INTERIM STATUS SURFACE IMPOUNDMENTS 40 CFR 265 Subpart K

130. 2 ft. of freeboard in surface impoundment..... ☐
131. Earthen dikes have protective covers..... ☐
132. Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment..... ☐
133. Freeboard level inspected each operating day..... ☐
134. Dikes and vegetation inspected weekly for leaks, deterioration, or failures..... ☐
135. Inspections recorded in inspection log..... ☐
136. Is the waste treated, rendered, or mixed so that mixture no longer meets the definition of ignitable or reactive..... ☐
137. Incompatible wastes segregated in separate surface impoundments..... ☐

.. GROUNDWATER MONITORING 40 CFR 265 Subpart F

Applicable to surface impoundments, landfills and landfarms

138. Monitoring program and wells installed..... ☐
139. Sampling and analysis during first year quarterly obtain copies' 265.92..... ☐
140. After first year, semi-annual sampling and analysis of indicator parameters..... ☐
141. After first year, annual sampling and analysis of ground water quality parameters..... ☐
142. Evaluation using students t-test 265.93(b)..... ☐
143. Alternate groundwater monitoring system 265.90(d)..... ☐

Comments: TANKS LEVEL STICK TESTED ONCE PER DAY

Please mark boxes as shown

☒ In compliance

■ In violation

Inspector's Signature Steve A Johnson

Title ENVIRONMENTAL SPECIALIST

Office KCRO